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Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee, on Behalf of the Holders of the Harborview Mortgage Loan Trust Mortgage Loan Pass-Through Certificates, Series 2006-12

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WELLS FARGO BANK, N.A., AS
TRUSTEE, ON BEHALF OF THE
HOLDERS OF THE HARBORVIEW
MORTGAGE LOAN TRUST MORTGAGE
LOAN PASS-THROUGH CERTIFICATES,
SERIES 2006-12,

Plaintiff,

vs.

OLD REPUBLIC TITLE INSURANCE
GROUP, INC.; OLD REPUBLIC NATIONAL
TITLE INSURANCE COMPANY; OLD
REPUBLIC TITLE COMPANY OF
NEVADA; DOE INDIVIDUALS I through X;
and ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:20-cv-01430-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
25-27]**

[First Request]

COMES NOW Plaintiff Wells Fargo Bank, N.A., as Trustee, on Behalf of the Holders of the Harborview Mortgage Loan Trust Mortgage Loan Pass-Through Certificates, Series 2006-12 (“WFB”), and Defendants Old Republic National Title Insurance Company (“OR National”), Old Republic Title Insurance Group, Inc. (“ORTG”) and Old Republic Title of Nevada (“ORTNV”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On July 31, 2020, WFB filed its Complaint in Eighth Judicial District Court, Case No. A-20-818906-C [ECF No. 1-2];
2. On August 3, 2020, OR National filed a Petition for Removal to this Court [ECF No. 1];
3. On September 23, 2020, OR National filed a Motion to Dismiss [ECF No. 25];
4. On September 23, 2020, ORTNV filed a Motion to Dismiss [ECF No. 26];
5. On September 23, 2020, ORTG filed a Motion to Dismiss [ECF No. 27];
6. WFB's deadline to respond to all pending Motions to Dismiss is currently October 7, 2020;
7. WFB's counsel is requesting an extension until Friday, November 6, 2020, to file its response to all pending Motions to Dismiss;
8. This extension is requested to allow counsel for WFB additional time to review and respond to the points and authorities cited to in the Motions;
9. Counsel for ORTNV, ORTG and OR National does not oppose the requested extension;

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1 10. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 2nd day of October, 2020.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Robbins

7 Lindsay D. Robbins, Esq.

8 Nevada Bar No. 13474

9 7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

10 *Attorneys for Plaintiff, Wells Fargo Bank,*

N.A., as Trustee, on Behalf of the Holders of

11 *the Harborview Mortgage Loan Trust*

12 *Mortgage Loan Pass-Through Certificates,*

Series 2006-12

DATED this 2nd day of October, 2020.

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

13 /s/ Sophia S. Lau

Scott E. Gizer, Esq.

Nevada Bar No. 12216

Sophia S. Lau, Esq.,

Nevada Bar No. 13365

8716 Spanish Ridge Avenue, Suite 105

Las Vegas, Nevada 89148

14 *Attorneys for Defendants, Old Republic*

National Title Insurance Company, Old

Republic Title Insurance Group, Inc. and

Old Republic Title of Nevada

15 **IT IS SO ORDERED.**

16 Dated this 11th day of October, 2020.

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18 RICHARD F. BOULWARE, II
19 UNITED STATES DISTRICT JUDGE
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